

1 MARIO P. LOVATO  
2 Nevada Bar No. 7427  
3 LOVATO LAW FIRM, P.C.  
4 7465 W. Lake Mead Blvd. Ste. 100  
5 Las Vegas, Nevada 89128  
6 T: (702) 979-9047  
7 mpl@lovatolaw.com  
8 Attorney for Defendants

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

MICHAEL RENO, ERIC KIEFABER, ) CASE NO. 2:18-CV-840-APG-NJK  
DENNIS RHOADES, JASON HARRIS, )  
PREMIER TAMAYO, WILFREDO )  
ALLANIGUE, and ARIES BIHASA, )  
Plaintiffs, )  
vs. )  
WESTERN CAB COMPANY, HELEN )  
TOBMAN MARTIN, MARILYN )  
TOBMAN MORAN, JANIE TOBMAN )  
MOORE, MARTHA SARVER, and )  
JASON AWAD, )  
Defendants. )

---

STIPULATION

IT IS HEREBY STIPULATED AND AGREED by and between counsel for the parties  
that the deadline for Defendants to file their response to Plaintiffs' Motion to Compel FCRP Rule  
30(b)(6) deposition (#196) be EXTENDED such that Defendants' response shall be due on **August  
7, 2020.**

IT IS FURTHER STIPULATED AND AGREED by and between counsel for the parties  
that that the deadline for Plaintiffs to file their reply after such response shall be EXTENDED such  
that Plaintiffs' Reply shall be due on **August 14, 2020.**

In support of this Stipulation, the parties submit that such extensions are minor, that they  
are entered into in light of the intervening weekend that otherwise reduces the time for submitting

///

///

1 the respective response and reply, that defense counsel was out-of-the-office for a pre-planned  
2 matter from July 30, 2020 to August 4, 2020, that both defense counsel and Plaintiffs' counsel  
3 submitted timely filings seeking limited extensions in light of the above, and that this provides for  
4 prompt submission of briefing addressing the merits of the motion while also allowing counsel to  
5 handle obligations coming due in this, and other, matters.

7 Dated: August 5, 2020.

Dated: August 5, 2020.

8 LEON GREENBERG  
9 PROFESSIONAL CORPORATION

LOVATO LAW FIRM, P.C.

10  
11 /s/ Leon Greenberg  
LEON GREENBERG, ESQ.  
12 Nevada Bar No. 8094  
2965 South Jones Blvd., #E3  
13 Las Vegas, NV 89146  
Tel (702) 383-6085  
14 Fax (702) 385-1827  
15 Attorneys for Plaintiffs

/s/ Mario Lovato  
MARIO P. LOVATO  
Nevada Bar No. 7427  
16 Attorney for Defendants

**ORDER**

17 IT IS SO ORDERED.

18 DATED: August 6, 2020.

19  
20   
UNITED STATES MAGISTRATE JUDGE

21  
22  
23  
24  
25  
26  
27  
28